

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 2270

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On August 30, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ Fifth Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 2270] (the “Motion”)<sup>2</sup>.

2. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order from the Office of the United States Trustee (the “U.S. Trustee”).

3. In addition, the Debtors and Twilio, Inc. (“Twilio”) have agreed to adjourn the Motion solely as it relates to Twilio to the October 4, 2023 hearing.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

4. Accordingly, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as Exhibit A, to resolve the Informal Comments and remove Twilio. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as Exhibit B.

5. The Revised Order has been circulated to the U.S. Trustee, the Official Committee of Unsecured Creditors appointed in these chapter 11 cases and counsel to Twilio (collectively, the “Parties”). The Parties have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: September 12, 2023  
Wilmington, Delaware

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